

FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Numbering Resource Optimization

CC Docket No. 99-200

**COMMENTS OF THE CALIFORNIA PUBLIC UTILITIES COMMISSION
AND OF THE PEOPLE OF THE STATE OF CALIFORNIA**

The California Public Utilities Commission and the People of the State of California (California or CPUC) here respond to the Public Notice in CC Docket 99-200 issued by the Common Carrier Bureau of the Federal Communications Commission (FCC or Commission) on November 6, 2001. In the Public Notice, the Common Carrier Bureau sought comments on the national thousands-block number pooling rollout schedule (rollout schedule).

Pursuant to authority delegated by the FCC, California has opened number pools in 12 of California's 25 area codes. In early 2002, we propose to open two more number pools prior to the start of the national rollout.¹ Specifically, on February 1, 2002, we will open a pool in NPA 707 (Vallejo/Santa Rosa/Fairfield/Napa). According to the proposed rollout schedule, the 707 pool currently is listed to open in the third quarter of the rollout. Additionally, on March 1, 2002, California will open a pool in NPA 805 (Ventura/Santa Barbara). The 805 pool currently is listed for the second quarter in the proposed national rollout schedule.

¹ The CPUC will be issuing shortly an Administrative Law Judge's Ruling setting the dates for the opening of the two additional pools prior to start of the rollout. We will attach a copy of the ruling to our Reply Comments.

Since these two pools will be opened before the national pooling begins, we propose that the Common Carrier Bureau revise the rollout schedule by removing these two pools. We also, propose that the Common Carrier Bureau replace these NPAs with other, later scheduled, California NPAs.

Further, we note that the proposed schedule for the first quarter rollout contains four California NPAs. We recognize that in the *Report and Order and Further Notice of Proposed Rulemaking (First Report & Order)* in this docket, the FCC concluded that “[t]he schedule for each quarter will contain three NPAs from each of the seven NPAC regions that are within the largest 100 MSAs”.² Most California NPAs are at least partially contained within a top 100 MSA. While one or more of the area codes included in the 1st quarter rollout may have but a small portion of its territory contained in a top 100 MSA, we realize that the need to place more than one NPA per month into pooling could be a burden on the carriers. That, in turn, could result in problems that might affect service quality, or even call completion. As a consequence, the CPUC is not opposed to revising the 1st quarter schedule that would reduce to three the number

² FCC 00-104, released March 31, 2000, ¶ 161. California shares the western NPAC region with Hawaii and Nevada, neither of which have a pool included in the proposed national rollout schedule for the 1st quarter.

of area codes included. The fourth NPA could be moved down the list to replace either the 805 or 707, which will be opened pursuant to CPUC order prior to the start of the national rollout.

Respectfully submitted,

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